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2002 SEP 18 A 10:55

CORRESPONDENCE
CONTROL

STATE OF COLORADO

DUE DATE

ACTION

Bill Owens, Governor
Jane E. Norton, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

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8100 Lowry Blvd.
Denver, Colorado 80230-6928
(303) 692-3090Colorado Department
of Public Health
and Environment

DIST.	LTR	ENC
BOGENBERGER, V.		
BOGNAR, E.	X	
DECK, C. A.	X	
DEGENHART, K.		
DIETER, T. J.		
DIETERLE, S. E.		
FERRERA, D. W.	X	
FERRI, M. S.		
GERMAIN, A. L.		
GIACOMINI, J. J.		
ISOM, J. H.		
LINDSAY, D. C.		
LONG, J. W.		
MARTINEZ, L. A.	X	
NAGEL, R. E.	X	
NORTH, K.	X	
PARKER, A. M.		
POWERS, K.		
RODGERS, A. D.		
SHELTON, D. C.	X	
SPEARS, M. S.		
TRICE, K. D.		
TUOR, N. R.		
VOORHEIS, G. M.		
WILLIAMS, J. L.		
BUTLER, L.	X	
BROOKS, L.	X	
LEITNER, R.	X	
ROSENMAN, A.	X	
BERARDIAN, J.	X	
NESTOR, S.	X	
ARNOLD, P.	X	
CAVORATO, K.	X	

COB CONTROL	X	X
ADMN. RECORD	X	
PATS/130		

Reviewed for Addressee
Corres. Control RFP9/16/02
Date Byg

Ref. Ltr. #

DOE ORDER #

5400.1

September 10, 2002

Mr. Joseph A Legare

Assistant Manager for Environment and Infrastructure

U.S. Department of Energy, Rocky Flats Field Office

10808 Highway 93, Unit A

Golden, CO 80403-8200

RE: Draft Industrial Area Sampling and Analysis Plan (SAP) Fiscal Year 2002 Addendum
#IA-02-08 Under Building Contamination (UBC) IHSS Group 700-3 - Approval

Dear Mr. Legare:

The Colorado Department of Public Health and Environment, Hazardous Materials and Waste Management Division has reviewed the SAP Addendum #IA-02-08. This SAP was received by the Division on August 21, 2002. This SAP is indicated to be performed to support D&D activities, with the ER investigation of this IHSS to be performed at a later date. Based on the responses to the Divisions comments, information provided in this SAP, and inclusion of the modification as previously provided (adding VOCs to the 0-6 inch interval), the Division is approving this SAP with the following concerns:

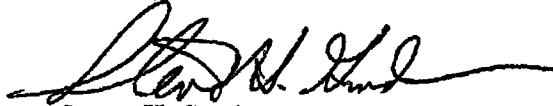
- 1) These six locations and the analysis to be performed may not be sufficient to identify all of the possible contaminants of concern that may be under these buildings. Although there may not have been any specific activity that might have generated or released other possible contaminants, the previous fire may have generated contaminants that could have been released with the water used to fight the fire. As such, SVOCs and dioxins may have been generated and released to the environment under the building. Therefore, it is recommended that SVOCs and dioxins be added to this SAP. However, if these are not added for this sampling effort, then these may need to be added in future sampling events.
- 2) Clean closure of a RCRA Unit does not necessarily mean that the concrete is clean. It only means that the concrete does not need to be managed as a hazardous waste. The concrete may still have levels of hazardous constituents requiring that it be removed and managed as a solid waste, and that it is not recyclable. As such, it is recommended that the concrete be sampled to determine the levels of hazardous constituents that may be present. However, if the concrete is not sampled during this sampling event it may need to be sampled during a later event, even if the RCRA Unit is clean closed.

ADMIN RECORD
IA-A-001079

Although the Division is approving this sampling and analysis plan prior to actually making the modifications as previously discussed, we are doing so with the understanding that the consultative process will be utilized to keep us apprised of the activities addressed in the SAP as well as make other possible modifications.

If you have any questions regarding this correspondence please contact me at (303) 692-3367, David Kruchek at (303) 692-3328, or Elizabeth Pottorff at (303) 692-3429.

Sincerely,



Steven H. Gunderson
RFCA Project Coordinator

cc: Norma Castaneda, DOE
Reginald Tyler, DOE
Tim Rehder, EPA
Gary Kleeman, EPA
Mark Sattelberg, USFWS
Lane Butler, KH
Dave Shelton, KH
Administrative Records Building T130G



2/2